

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

IN RE:

Richard Ayala)
Baylee Ayala) Case No. 25-40390
Debtors.)

RESPONSE TO MOTION TO DENY CONFIRMATION OF PLAN

COME NOW Richard Ayala and Baylee Ayala (“Debtors”), by and through their undersigned counsel, and in response to the Trustee’s motion to deny confirmation, state the following:

1. Debtors will provide the Trustee with a recorded deed of trust for their residence.
2. It appears that creditor Freedomroad Financial has provided proof of perfection of the security interest in the Segway.
3. Debtors ask that the Trustee’s motion to deny confirmation of plan, be denied.

WHEREFORE, Debtors pray the Court deny the Trustee’s motion to deny confirmation, and for such further relief as the Court deems just and proper.

Respectfully Submitted,

COOK ELLIS LLC

/s/ Coleman R. Ellis
Coleman R. Ellis #62252
4016 S. Lynn Ct. Dr.
Independence, MO 64055
(816) 373-7379 Phone
(816) 307-7328 Fax
ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed by either U.S. Mail or electronic mail, this 29th day of April 2025 to:

Richard V. Fink, Chapter 13 Trustee

/s/ Coleman R. Ellis
Coleman R. Ellis